



# KANSAS

## DEPARTMENT OF HEALTH & ENVIRONMENT

BILL GRAVES, GOVERNOR

Gary R. Mitchell, Secretary

September 28, 1998

REC'D

OCT 01 1998

RCAP

Elbridge W. Bartley  
Waste Management Division  
United States Environmental Protection Agency  
726 Minnesota Avenue  
Kansas City, Kansas 66101

RE: Review of RCRA Facility Investigation Phase I Work Plan  
Safety-Kleen Wichita Facility, EPA Identification No. KSD007246846

Dear Mr. Bartley:

The Kansas Department of Health and Environments Bureau of Environmental Remediation (KDHE-BER) has reviewed the document titled *Draft* "RCRA Facility Investigation Phase I Work Plan, EPA Identification No. KSD007246846, Safety-Kleen Wichita Facility, Formerly Laidlaw Environmental Services (Wichita), 2549 North New York, Wichita, Kansas". KDHE has determined through previous investigations that the Safety-Kleen Wichita Facility is a probable source area of contamination identified in the North Industrial Corridor (NIC) Site (formerly known as the 29<sup>th</sup> and Mead Site). KDHE is requesting that source control measures be conducted at all probable source areas within the NIC Site. KDHE believes that in keeping with the EPA Memorandum dated September 24, 1996, "Coordination between RCRA Corrective Action and Closure and CERCLA Site Activities", the requirements of a source control investigation within the NIC Site can be fulfilled as part the RCRA Facility Investigation (RFI) being conducted under EPA oversight. KDHE's review and comments on this document focus on the Work Plan's ability to fulfill KDHE's requirements for source control measures.

KDHE provides the following comments concerning the document cited above:

1. KDHE is concerned by the lack of ground water sampling proposed for this phase of investigation. Previous investigations have indicated the presence of chlorinated solvents in soil and soil vapor on site and in the ground water immediately down gradient of the facility. KDHE has discovered that it is often more economical and efficient in the Arkansas Alluvium to use ground water contaminant concentration data to more precisely locate appropriate soil sampling locations in regards to potential source areas. KDHE has extensive investigative experience in this alluvial aquifer and has found that source areas are difficult to locate because the contaminants are often detected in the soils only at the immediate release areas which may be small or located in unexpected areas. This difficulty in finding source areas is probably directly related to the high permeability and strong proclivity towards vertical migration in the alluvial aquifer at the NIC Site. It is

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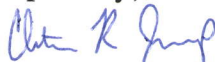
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unlikely that KDHE-BER will accept a determination that the Safety-Kleen facility is not a source of ground water contamination in the NIC Site, based on soil sampling alone. KDHE highly recommends collecting ground water samples at the site prior to or during the proposed soil investigation in order to potentially avoid an additional mobilization to the site.

2. KDHE-BER also highly recommends soil and ground water samples be collected from within and down gradient of the former buried paint can pit. The data discussed in section 3.7 and presented in Appendix A indicates that the concentrations of contaminants in the liquid and solid samples collected from the pit are high enough to have acted as a source of ground water contamination. The information provided in the RFI Work Plan is insufficient to determine whether this potential source area was fully delineated and completely removed, or whether it is acting as a current source area. The samples identified as #1 through #4 were only analyzed for TCLP analysis; however, KDHE-BER typically requires analysis of total contaminants for confirmation sampling.
3. KDHE notes that according to ground water elevation data collected for the NIC Site, the ground water flow direction in the vicinity of the Safety-Kleen Facility appears to be towards the south east. Please evaluate the proposed boring locations with regards to the ground water flow direction .
4. KDHE requests additional sampling points (particularly ground water) downgradient of buildings I and J. Even though there are not known releases in this area, these buildings were historically used for solvent distillation processes and for solvent storage and distribution at a time when releases were not documented as rigorously as current standards require.
5. KDHE requests additional sampling points along the railroad spur at loading and unloading areas.

Please call me at (785) 296-1935 if you or Safety-Kleen representatives have any questions concerning these comments.

Respectfully,



Christine R. Jump  
Environmental Geologist  
Remedial Section/Remedial Unit  
Bureau of Environmental Remediation

CRJ/lgs

cc: Rob Elder -> Site File  
Ron Robertson, Safety-Kleen  
Bill Bunn, EPA Superfund Section